

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

v.

HONDA MOTOR CO., LTD., et al.

Defendants.

Civil Action No. 2:21-cv-390-JRG-RSP

**JOINT MOTION TO EXTEND TIME TO MOVE, ANSWER, OR OTHERWISE
RESPOND TO PLAINTIFFS' ORIGINAL COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

I.

NOW COMES Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (“Plaintiffs” or “Intellectual Ventures”) and Defendants American Honda Motor Co., Inc. (“AHM”), American Honda Finance Corp. (“AHFC”), Honda Development & Manufacturing of America, LLC (“HDMA”) (formerly known as Honda of America Manufacturing, Inc.), Honda Manufacturing of Alabama, LLC (“HMA”), Honda Manufacturing of Indiana, LLC (“HMI”), and Honda Motor Company, LTD. (“Honda Motor”) (collectively “Defendants”) and move the Court to extend the time to answer or otherwise respond to Intellectual Ventures’ Original Complaint on or before January 31, 2022. Without waiving any other defenses described or referred to in Rule 12 of the Federal Rules of Civil Procedure, Defendants agree not to contest service of Plaintiffs’ Original Complaint.

II.

On October 19, 2021, Intellectual Ventures filed its Original Complaint, Dkt. 1. The deadline for AHM, AHFC, HMA, and HMI to respond to Intellectual Ventures' Original Complaint is November 19, 2021. The deadline for HDMA to respond to Intellectual Ventures' Original Complaint is December 6, 2021.

III.

Defendant Honda Motor, a foreign entity, has agreed to a Waiver of Service under the Hague Convention, pursuant to which Honda Motor's deadline to move, answer, or otherwise respond to Intellectual Ventures' Original Complaint shall be January 31, 2022.

IV.

As a condition for Honda Motor's agreement to waive service under the Hague Convention, and for Defendants' agreement not to contest service of Intellectual Ventures' Original Complaint under Rule 12 of the Federal Rules of Civil Procedure, and in order to streamline the response deadlines for all Defendants, the parties have agreed to extend Defendants' deadline to move, answer, or otherwise respond to Intellectual Ventures' Original Complaint up to, and including, January 31, 2022. Good cause exists by providing the same and consistent deadlines for the Defendants.

V.

The parties seek this extension of time not for delay, but for good cause so that justice may be served. Defendants' agreement with Intellectual Ventures should not be construed as a waiver of any other rights or defenses, including, for instance, Defendants' right to file counterclaims, affirmative defenses, or to otherwise challenge the validity of the subject patents.

WHEREFORE, Plaintiffs and Defendants respectfully pray that the time for Defendants to move, answer, or otherwise respond to Plaintiffs' Original Complaint be extended to and including January 31, 2022.

Dated: November 19, 2021

RESPECTFULLY SUBMITTED,

By: /s/ Jonathan K. Waldrop
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Attorneys for Plaintiffs
INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC

CERTIFICATE OF CONFERENCE

This is to certify that counsel for the parties have complied with the meet and confer requirement in Local Rule CV-7(h). The personal conference required by Local Rule CV-7(h) was conducted on November 12 and 16-18, 2021.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop

CERTIFICATE OF SERVICE

The undersigned certifies that on November 19, 2021, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). This motion was served on all counsel by electronic filing.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop